

The CPMP Fifth Annual Action Plan includes the <u>SF 424</u> and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 5 Action Plan Executive Summary:

The City of Victorville's Community Development Block Grants (CDBG) program is authorized by the Housing and Community Development Act of 1974, which provides eligible entitlement communities with annual grants that can be used to provide decent housing, suitable living environments, and expanded economic opportunities, principally for low and moderate income persons. The City became an entitlement community in 1997 and expects to receive \$1,164,676.

The City's Home Investment Partnership (HOME) grant is authorized under Title II of the Cranston-Gonzales National Affordable Housing Act of 1990. HOME funds are required to be used for affordable housing activities. In 2004, the City formed a HOME consortium with the Town of Apple Valley in order to meet the threshold of obtaining HOME entitlement status with HUD, which resulted in an annual allocation of funds to both communities. The City of Victorville expects to receive approximately \$310,326 in HOME funds for FY 2016-2017.

Priority Needs established in the 2012-2017 Consolidated Plan, which form the basis for establishing objectives and outcomes in the Strategic Plan and FY 2016-2017 Annual Action Plan, are as follows:

- 1. Preserve the existing housing stock;
- 2. Expand the supply of affordable housing;
- 3. Assist in reducing housing cost of extremely low- and low- income households;
- 4. Increase affordable homeownership opportunities;

- 5. Eliminate blighted conditions and substandard housing through enhanced code enforcement activities and demolition;
- 6. Provide shelter and related services to meet the needs of the homeless population and support the development of a continuum of care system on a region wide basis;
- 7. Assist special needs persons with reducing housing cost and with meeting their rehabilitation needs;
- 8. Affirmatively further fair housing to ensure equal access to housing for lower income, ethnic minorities and special needs groups;
- 9. Coordinate public and private efforts to reduce lead based paint hazards and protect young children;
- 10. Create safer, more attractive and more accessible neighborhoods and stimulate economic growth through the improvement of infrastructure;
- 11. Provision of public facilities and park improvements;
- 12. Address public service needs;
- 13. Expand the economic base and promote greater employment opportunities for residents.

In addition, the City has incorporated outcome measures for activities in accordance with the Federal Register Notice dated March 7, 2006, which requires the following Performance Measure Objectives/Outcomes to be associated with each activity:

General Objective Categories

Activities will meet on of the following:

- Decent Housing (DH)
- A Suitable Living Environment (SL)
- Economic Opportunity (EO)

General Outcome Categories

Activities will meet one of the following:

- Availability/Accessibility (1)
- Affordability (2)
- Sustainability (3)

Based on these priorities, the projects to be funded and objectives and outcomes anticipated during FY 2016-2017 are shown in Table 1 below.

Table 1: City of Victorville Proposed FY 2016-2017 CDBG and HOME Projects				
Priority	Category/Activity	National	Performance	Allocation/Funding
Number		Objective	Objective/Outcome	Source
ADMINIS	TRATION			
N/A	CDBG Administration	N/A	N/A	\$232,936 CDBG
N/A	HOME	N/A	N/A	\$16,333 HOME
	Administration			
HOUSING	T			
1, 2, 3	Senior Home Repair Program	LMH	DH-1	\$244,994 HOME
1 and 5	Code Enforcement	LMH	DH-1	\$190,000 CDBG

1 and 5	Demolition of	LMA	DH-1	\$150,000 CDBG
1 and 3	Dangerous Buildings	Livii	DII I	\$130,000 CDBG
1, 2, 3	Code Compliance Rehabilitation Program	LMH	DH-1	\$166,039 CDBG
1, 2, 3	Curb Appeal Program	LMH	DH-1	\$156,000 CDBG
2 and 3	Community Housing Development Organization	LMH	DH-1	\$48,999 HOME
CONSTI	RUCTION AND OTHER	COMMUN	ITY DEVELOPM	ENT PROJECTS
10	Victor Valley Community Services Council	LMC	SL-3	\$20,000 CDBG
10	Victorville Senior Citizens Club	LMC	SL-3	\$25,000 CDBG
11	ADA Code Inspection and Improvement Project	LMA	SL-3	\$50,000 CDBG
PUBLIC	SERVICES			
8	Court Appointed Special Advocates of San Bernardino County	LMC	SL-1	\$2,500 CDBG
8	High Desert Homeless Services	LMC	SL-1	\$30,000 CDBG
8	High Desert Transitional Living	LMC	DH-1	\$5,000 CDBG
8	Inland Fair Housing and Mediation Board	LMC	DH-1	\$15,000 CDBG
8	Legal Aid Society of San Bernardino	LMC	SL-1	\$10,000 CDBG
8	Moses House Ministries and Rose of Sharon Pregnancy Resource Center	LMC	SL-1	\$12,500 CDBG
8	San Bernardino Sexual Assault Services	LMC	SL-1	\$10,000 CDBG
8	St. John of God Health Care Services and Victor Valley Community Services Council	LMC	SL-1	\$12,500 CDBG
8	Victor Valley	LMC	SL-1	\$20,000 CDBG

	Domestic Violence- A			
	Better Way			
8	6 TH Street After	LMC	SL-1	\$20,000 CDBG
0	School Program	LIVIC	SL-1	\$20,000 CDBG
	Brentwood After			_
8	School Enrichment	LMC	SL-1	\$20,000 CDBG
	Program			
	Victorville City			
8	Library Homework	LMC	SL-1	\$12,500 CDBG
O	and Educational	LIVIC	SL-1	\$12,500 CDBG
	Literacy Program			
4, 8	Graffiti Abatement	LMA	SL-3	\$4,701 CDBG

General Questions

- 1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
- 2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
- 3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

Program Year 5 Action Plan General Questions response:

The geographic distribution of Victorville's proposed projects for 2016-2017 are as follows:

- 1. Public Improvement projects funded with CDBG funds and are located primarily in the City's CDBG target areas (See Appendix F Map). The CDBG Target Area map has been updated with the 2010 census tract data. The census tracts identified are those with low and moderate income households that make up 50% or higher of the tract's population. The new map is included for approval;
- 2. Supportive services are available citywide to low and moderate income residents and persons with special needs;
- 3. Housing programs funded with CDBG and HOME funds are available to low and moderate income persons on a citywide basis;
- 4. Administrative cost and fair housing services are available on a citywide basis.

For FY 2016-2017, the City of Victorville will receive \$1,164,676 in CDBG funds. A maximum of 15 percent or \$174,701 of these funds may be utilized for public service activities; up to 20 percent or \$232,936 may be used for program administration and fair housing activities; and the remaining 65 percent or \$757,039 may be used for capital projects in the target areas or housing programs for income-eligible persons.

- 1. The Priority Needs identified in the City's FY 2012-2017 Consolidated Plan will be the basis for allocating investments geographically within the jurisdiction during the next year. The established priorities are listed on pages one (1) and two (2).
- 2. A major obstacle for the City of Victorville in meeting underserved needs is the lack of adequate financial resources to meet the growing needs of low and moderate income persons. With the formation of the Apple Valley/Victorville Consortium, the City will continue to expand its housing programs to meet the growing need for affordable housing. In addition, the City will continue to use CDBG funding to support public service agencies that address the special needs of the underserved, including the homeless, the potential homeless, youth, seniors, female-headed families, victims of domestic violence, and the disabled.
- 3. The City is continuously proactively seeking additional resources to meet the underserved needs. Federal, state, and local resources expected to be made available to address the needs identified in the Consolidated Plan.

Currently, CalHome funds are being utilized in the City's down-payment assistance program and owner occupied rehabilitation program.

Managing the Process

- 1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
- 2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
- 3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Program Year 5 Action Plan Managing the Process response:

1. The Town of Apple Valley serves as the lead agency in coordinating the consolidated planning and submission process, while the City of Victorville serves as a participating jurisdiction. Each jurisdiction is responsible for administering its own Community Development Block Grant (CDBG) program, while the Town of Apple Valley administers the HOME program for both. Each jurisdiction is also responsible for preparing its own Annual Action Plan and Consolidated Annual Performance Evaluation and Review (CAPER).

- 2. Extensive efforts were undertaken to solicit input in the development of the Annual Action Plan for FY 2016-2017. The City's process for consultation and participation is described below:
 - On November 18, 2015, City Housing staff met with public agencies, for profit agencies, and non-profit organizations as part of the consultation process for the Action Plan. A summary of the survey results is attached as Appendix C. Emergency services, youth services and senior services scored the highest as a priority community need.
 - Public hearings were held on January 19, 2016 and April 19, 2016 at the City of Victorville Council Chambers at 6:00 pm. Public notices of the hearings were published in the *County Legal Reporter* on January 16, 2015 and the Daily Press on March 22, 2016, respective to meeting dates.
 - Formal approval and adoption of the final Action Plan will occur at the City Council meeting on April 19, 2016 at 6:00 pm at the City of Victorville Council Chambers.
- 3. Actions that the City will undertake during the next year to enhance coordination between public and private housing, health, and social service agencies include:
 - Provision of technical assistance workshops during the "Notice of Funding Availability" stage of the action plan planning process;
 - Participation in the San Bernardino County Homeless Partnership;
 - Working with the Community Services Council to expand their senior rehabilitation program;
 - Working with the Victorville Senior Citizens Club to rehabilitate their kitchen area in order to serve meals to very low and low income seniors;
 - Collaborative efforts will be met between the Development Department and Economic Development Department to develop new housing rehabilitation programs and code compliance/corrections programs;
 - Coordination with the San Bernardino County Housing Authority to provide Housing Choice Vouchers;
 - Coordination with the County of San Bernardino Health Department, Childhood Lead Poisoning Prevention Program (CLPPP) to address lead-based paint hazards;
 - Coordination with the Town of Apple Valley to provide affordable housing through the HOME program.

Citizen Participation

- 1. Provide a summary of the citizen participation process.
- 2. Provide a summary of citizen comments or views on the plan.

- 3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
- 4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

Program Year 5 Action Plan Citizen Participation response:

1. The purpose of the Citizen Participation Plan is to provide the method and process by which the City's consolidated planning process will comply with the citizen participation requirements set forth by the United States Department of Housing and Urban Development (HUD) pursuant to section 104(a)(3) of the Housing and Community Development Act of 1974, as amended, and further augmented by program regulations under 24 CFR Part 91, Subpart B. Through implementation of this Citizen Participation Plan, citizens are afforded the maximum feasible opportunity to provide input on housing and community development needs; issues and problems affecting very-low and low income persons; learn about various programs available and the expected amount of assistance provided and allowed by each opportunity; to develop local project proposals; to give input to project selections and funding distributions; and to participate in the implementation of funded activities.

The City of Victorville encourages citizen participation, with a particular emphasis on participation by persons of very low and low income, as well as residents of target neighborhoods and/or neighborhoods which are eligible by definition under the Housing and Community Development Act of 1974, as amended. In order to reach as many participants as possible, the City notifies community organizations and agencies which advocate for persons of very low and low income, concerning needs assessment opportunities, availability of funds, and participation opportunities.

A 30-day public comment period was provided between March 22, 2016 and April 25, 2016 for review of the FY 2016-2017 draft Annual Action Plan. A public notice was published in the *Daily Press* on March 22, 2016 announcing the commencement and ending dates of the review period. A copy of the public notice is provided in Appendix E. The Action Plan was made available for public review on the City's website (www.victorvillecity.com) and at Victorville City Hall located at 14343 Civic Drive. It was also available for review by requesting copies in person, by telephone, fax, or e-mail.

2. During the public comment period and the public hearings, the City received _____ comments from citizens. It is included in Appendix C.

- 3. In an effort to broaden public participation in the development of the Action Plan, including outreach to minorities and non-English speaking persons, a Spanish speaking staff member was available at all public meetings for translation services. Statements regarding the availability of special accommodations were printed on all written materials pertaining to the Annual Action Plan development.
- 4. The City of Victorville made every effort to respond to all relevant comments.

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Program Year 5 Action Plan Institutional Structure response:

The City of Victorville strives to foster and maintain relationships with other agencies to establish an institutional structure that maximizes its resources. The City's institutional structure consists of public agencies, for-profit agencies, and non-profit organizations. To address housing needs, the City partners with the Town of Apple Valley to form a Consortium to receive HOME funds. The City works with the County of San Bernardino to provide affordable housing opportunities to extremely low and low income renters in Victorville. The City works with the San Bernardino Homeless Partnership, as well as Victor Valley Domestic Violence and High Desert Homeless Services to address homeless issues. In FY 2016-2017, the City will also work with the agencies and internal departments listed in Table 1 to bridge any identified gaps in the service delivery system. We receive quarterly reports from the agencies and internal departments we fund about the ongoing services they provide.

Additionally, the City anticipates holding public meetings to solicit input regarding needs of the community. These efforts provide for regional collaboration to better serve our community.

Monitoring

Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 5 Action Plan Monitoring response:

The City's Economic Development Department has the prime responsibility for overall program monitoring and compliance for the City of Victorville. Staff monitors each newly funded agency or department during the program year, conducts a desktop audit of each sub-recipient contract file annually, and conducts an on-site monitoring visit with each sub-recipient and City department at least once every two years. Each monitoring visit is followed up with a formal letter with the results of the monitoring visit. If concerns or findings are found, the sub-recipient or department is given 30 days to either

correct the problem, or provide a corrective action plan to the Economic Development Department.

The Economic Development Department also ensures compliance with all Federal and City contracting regulations, including procurement, Federal Labor Standards, Davis-Bacon, equal opportunity, et al. While construction projects are underway, weekly on-site compliance interviews with the workers are conducted.

During FY 2015-2016, the City conducted four (4) on site sub-recipient monitoring. In addition, the Economic Development Department will ensure compliance with the US Office of Management and Budget (OMB) requirements for conducting single audits, as well as comply with the US Department of Housing and Urban Development (HUD) reporting requirements for accomplishment in the Integrated Disbursement and Information System (IDIS).

Lead-based Paint

Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 5 Action Plan Lead-based Paint response:

The City's overall lead-based paint hazard reduction strategy and goal is to reduce the number of cases from lead poisoning, particularly cases that involve children. An estimated 4,662 units occupied by low and moderate-income households in Victorville may contain lead-based paint (11 percent margin of error), based on the housing unit age and income of occupants. Compared to upper-income households, these households are financially less capable of performing the maintenance or rehabilitation needed to reduce lead-based paint hazards.

The City has integrated lead-based paint hazard evaluations into housing rehabilitation projects. As a condition of funding assistance through the City's federally funded housing rehabilitation, the City requires:

- Evaluation of homes constructed prior to 1979 for lead-based paint hazards and notification of homeowners or occupants if lead-based paint hazards are identified
- Inclusion of lead-based paint hazard evaluation, testing and reduction as eligible activities for funding assistance
- Review of plans by the Development Department for rehabilitation of residential structures and inspections of the project in progress to assure compliance with all applicable building codes
- Provide "Protect Your Family from Lead in Your Home" pamphlet to owner occupied rehabilitation and senior home repair program participants.

• Every homebuyer participating in the Mortgage Assistance Program (MAP) is provided with information about lead based paint hazards.

During FY 2016-2017, the City of Victorville will also coordinate with the County of San Bernardino Health Department, Childhood Lead Poisoning Prevention Program (CLPPP) to provide follow-up and case management services to children who meet the case definition of elevated blood levels.

HOUSING

Specific Housing Objectives

Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.

Program Year 5 Action Plan Specific Objectives response:

Projects/programs to be funded with CDBG and HOME funds for FY 2016-2017 and their associated priorities and objectives are described below:

Senior Home Repair Program: This program is administered by the Economic Development Department. The program provides grants to low-income homeowners who are: at least 62 years of age; or handicapped; or permanently disabled to make home repairs to correct code violations and unsafe conditions.

Five-Year Objective:	75 households
FY 2016-2017 Objective:	20 households
Benefit:	Low and Moderate-Income Housing (LMH)
Geographic Distribution:	Citywide
Performance Measure	Decent Housing/Availability and Accessibility
objective/Outcome:	(DH-1)
FY 2016-2017 Allocation:	\$244,994 HOME

Senior and Disabled Home Repair Program: This program is administered by Victor Valley Community Services Council. The program will assist senior and disabled Victorville residents with minor repair of health and welfare issues.

Five-Year Objective:	45 households
FY 2016-2017 Objective:	45 households
Benefit:	Low and Moderate-Income Housing (LMH)
Geographic Distribution:	Citywide
Performance Measure	Decent Housing/Availability and Accessibility
objective/Outcome:	(DH-1)
FY 2016-2017 Allocation:	\$244,994 HOME

Code Compliance Rehabilitation Program: This program is administered by the Economic Development Department. The program will assist income eligible property owners that have been cited to address existing Building or Sanitary code violations. Income eligible single family or owner-occupied multi-family homeowners shall receive, in the form of a thirty (30) interest and payment deferred loan, a maximum loan value of \$15,000.

Five-Year Objective:	10 households
FY 2016-2017 Objective:	10 households
Benefit:	Low and Moderate-Income Limited Clientele
	(LMC)
Geographic Distribution:	Citywide
Performance Measure	Suitable Living Environment/Accessibility and
Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$166,039 CDBG

Curb Appeal Program: The purpose of the program is to promote neighborhood revitalization by providing a loan up to \$10,000 for exterior improvements to residential properties in CDBG target areas, specifically the Old Town/Midtown area.

Five-Year Objective:	15 households
FY 2016-2017 Objective:	15 households
Benefit:	Low and Moderate-Income Limited Clientele
	(LMC)
Geographic Distribution:	Citywide
Performance Measure	Suitable Living Environment/Accessibility and
Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$156,000 CDBG

Fair Housing Program: The City's Fair Housing Program is administered through a contract with Inland Fair Housing and Mediation Board. The program provides a comprehensive fair housing program that includes education, outreach, enforcement, and landlord/tenant mediation services.

Five-Year Objective:	400 households
FY 2016-2017 Objective:	240 households
Benefit:	Low and Moderate-Income Limited Clientele
Belletit.	(LMC)
Geographic Distribution:	Citywide
Performance Measure	Suitable Living Environment/Accessibility and
Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$15,000 CDBG

Community Housing Development Organization: This project will rehabilitate the roofs of 18 buildings at Northgate Village Apartments.

Five-Year Objective:	5 households
FY 2016-2017 Objective:	138 households
Benefit:	Low and Moderate-Income Limited Clientele
belletit:	(LMC)
Geographic Distribution:	CDBG Target Area (Census Tract 117)
Performance Measure	Suitable Living Environment/Accessibility and
Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$48,999 HOME (Total allocation - \$800,000)

Needs of Public Housing

- 1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
- 2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 5 Action Plan Public Housing Strategy response:

- 1. The needs of public housing in the City of Victorville are typically met by the Housing Authority of San Bernardino County's (HASBC) participation in the Comprehensive Grant Program (CGP) as outlined in its Five-Year Public Housing Agency (PHA) Plan. All public housing in Victorville is scattered-site, and owned and/or managed by HASBC. A total of 1 public housing unit and 168 authority-owned units are located in the City. 798 units were assisted under the Housing Voucher Choice program.
- 2. HASBC is not designated as a "troubled" agency by HUD. According to HASBC, the physical condition of its public housing stock is considered to be good. The units are inspected, repaired, and maintained on a regular basis. It is the goal of HASBC to maintain each home, whether the unit is a single-family residence or an apartment complex.

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 5 Action Plan Barriers to Affordable Housing response:

Actions that will take place during the next year to remove barriers to affordable housing include:

- 1. Provision of housing assistance through the Senior Home Repair Program, Owner Occupied Rehabilitation Program Code Compliance Rehabilitation Program and Curb Appeal Program;
- 2. Provision of homeownership opportunities through the Mortgage Assistance Program (MAP) which is currently funded with Cal-Home funds;
- 3. Coordination with San Bernardino County Housing Authority Housing Voucher Choice;
- 4. Marketing the Mortgage Assistance Program through qualified participating lenders in the Victorville area.

HOME/ American Dream Down payment Initiative (ADDI)

- 1. Describe other forms of investment not described in § 92.205(b).
- 2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.
- 3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
 - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
 - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
- 4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
 - a. Describe the planned use of the ADDI funds.

- b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
- c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Program Year 5 Action Plan HOME/ADDI response:

- 1. Other Forms of Investment: The Consortium does not intend to use HOME funds for any other form of investment other than those described in 24CFR 92.205(b).
- 2. **Home Resale or Recapture:** The Consortium anticipates using HOME funds for homebuyer and rehabilitation programs within the Consortium area. The Consortium will recapture all funds invested in any homebuyer HOME activities. Once received, the funds will go back into a HOME account and will be expended in one or more HOME eligibility activities.
- 3. **ADDI Funds:** The Consortium does not anticipate receiving ADDI funds.

HOMELESS

Specific Homeless Prevention Elements

- 1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.
- 2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
- 3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.

- 4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
- 5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Program Year 5 Action Plan Special Needs response:

Projects/programs to be funded with CDBG and HOME funds for FY 2016-2017 and their associated priorities and objectives are described below:

High Desert Homeless Services: Provides shelter and related services for homeless families and individuals.

Five-Year Objective:	680 homeless
FY 2016-2017 Objective:	170 people
Benefit:	Low and Moderate-Income Limited Clientele
Denent:	(LMC)
Geographic Distribution:	Citywide
Performance Measure	Suitable Living Environment/Accessibility and
Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$30,000 CDBG

St. John of God Health Care Services and Victor Valley Community Services Council: Provides emergency rental assistance and utility payment assistance.

Five-Year Objective:	680 homeless
FY 2016-2017 Objective:	120 people
Benefit:	Low and Moderate-Income Limited Clientele
	(LMC)
Geographic Distribution:	Citywide
Performance Measure	Suitable Living Environment/Accessibility and
Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$12,500 CDBG

Victor Valley Domestic Violence - A Better Way Shelter and Support Services: Provides emergency shelter and related support services for victims of domestic violence.

Five-Year Objective:	2,000 people with special needs
FY 2016-2017 Objective:	190 people
Benefit:	Low and Moderate-Income Limited Clientele (LMC)
Geographic Distribution:	Citywide
Performance Measure	Suitable Living Environment/Accessibility and

Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$20,000 CDBG

Homelessness

The City of Victorville works with San Bernardino County Homeless Partnership (SBCHP). SBCHP was formed in September 2007 by order of the San Bernardino County Board of Supervisors to provide a more focused approach to issues of homelessness within the County. The Partnership consists of community and faith based organizations, educational institutions, non-profit organizations, private industry and federal, state and local governments. In April 2009, SBCHP completed the final draft of the 10 year strategy to end homelessness plan.

For FY 2016-2017, the City will commit CDBG funds to the High Desert Homeless Services and Victor Valley Domestic Shelter to provide emergency shelter and support services. The City of Victorville plans to address needs of individuals and families with children at imminent risk of becoming homeless as follows:

Emergency Shelter

As the only homeless shelter in the region, the High Desert Homeless Shelter continues to serve not only Victorville, but the entire High Desert area. In addition to the High Desert Homeless Shelter (capacity of 55 beds for persons with children), and Victor Valley Domestic Violence (capacity of 26) serve as emergency shelters to homeless persons who are victims of domestic violence. St. John of God Health Care Services provides emergency motel vouchers to homeless during harsh weather conditions.

Transitional Housing

As of March 2016, Victor Valley Domestic Violence administered a total of 21 units of transitional housing for victims of domestic violence. These units are leased and subsidized by several grant funding sources.

Permanent Housing

Both City and non-city administrated housing programs are available to assist low and extremely low-income residents to obtain permanent housing and aid in the prevention of homelessness. The existing assisted/subsidized housing programs located in the City are listed in Page 24, entitled "Rental Housing."

Homeless Prevention

The City of Victorville continues its efforts in the prevention of the homelessness by supporting the San Bernardino County Homeless Partnership (SBCHP) and its outreach programs, supporting the operation of homeless shelters through CDBG funding, and providing referrals to public assistance programs offered.

Chronic Homelessness Strategy

The San Bernardino County Homeless Partnership (SBCHP) formed a 10 year plan committee to address the diverse needs of the homeless population and provided a multidimensional framework to create solutions to help end chronic homelessness. In April 2009 the committee completed the final draft of the 10 year plan and presented it to the San Bernardino County Board of Supervisors. The plan includes specific strategic action steps that include the following: a) homeless prevention; b) community integration strategies; c) outreach and engagement system for the chronically homeless persons; and d) centralized assessment and regional referral and service delivery services; e) income and support services; f) shorten homelessness; g) permanent housing; h) homeless management information system; i) community issues; and j) funding the strategy.

In April 2013 the San Bernardino County Interagency Council on Homelessness presented a plan to recalibrate the results of a three year evaluation of the 2009-2019 strategy to end homelessness.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Program Year 5 Action Plan ESG response:

Not applicable; The City of Victorville does not receive/administer ESG funds.

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.

2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Program Year 5 Action Plan Community Development response:

PUBLIC FACILITIES AND IMPROVEMENTS

Victorville's priority community development needs can be found on page one and two of this FY 2016-2017 Action Plan.

During FY 2016-2017, the following public improvement projects will be undertaken:

Victorville Senior Citizens Club: Kitchen Remodel - The Victorville Senior Citizens Club Inc.'s kitchen remodel project will update and make functional the facility's existing kitchen. Plans for the remodel are to be able to prepare meals for low and moderate income seniors through the Meals on Wheels program. Currently meals for homebound seniors are being prepared in Barstow, a neighboring community about 50 miles in distance.

Five-Year Objective:	5 Units
FY 2016-2017 Objective:	1 Unit
Benefit:	Low and Moderate-Income Limited Clientele (LMC)
Geographic Distribution:	Citywide
Performance Measure	Suitable Living Environment/Accessibility and
Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$25,000 CDBG

Code Enforcement Program: This program is implemented by the Development Department. The Code Enforcement program promotes and enforces compliance with the Municipal Code relating to housing, zoning, and building codes. CDBG-funded Code Enforcement activities will focus primarily on the correction of housing code and building code violations in the target neighborhoods. In collaboration with the City's housing rehabilitation programs, Code Enforcement staff refers eligible households to appropriate programs for assistance.

Five-Year Objective:	6,250 Housing Units
FY 2016-2017 Objective:	500 Housing Units (28,746 people)
Benefit:	Low and Moderate-Income Area (LMA)
Geographic Distribution:	Target areas (all low mod census tracts and block
	groups)
Performance Measure	Suitable Living Environment/Accessibility and
Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$190,000 CDBG

Demolition of Dangerous Buildings: This program is implemented by the Development Department. This program provides demolition of dangerous structures and hazardous conditions in CDBG target areas along with abating illegally dumped trash.

Five-Year Objective:	5 Units
FY 2016-2017 Objective:	7 Units
Benefit:	Spot Blight
Geographic Distribution:	CDBG Target Area (all low mod census tracts and
	block groups)
Performance Measure	Decent Housing/Accessibility and Availability
Objective/Outcome:	(DH-1)
FY 2016-2017 Allocation:	\$150,000 CDBG

ADA Code Compliance Inspection and Improvement Project: This project anticipates performing an ADA code inspection and construction to remedy ADA deficiencies. Construction will include bathroom enlargement and renovation.

Five-Year Objective:	5 Units
FY 2016-2017 Objective:	7 Units
Benefit:	Spot Blight
Geographic Distribution:	CDBG Target Area (all low mod census tracts and
	block groups)
Performance Measure	Decent Housing/Accessibility and Availability
Objective/Outcome:	(DH-1)
FY 2016-2017 Allocation:	\$150,000 CDBG

PUBLIC SERVICES

Victorville's priority community development needs can be found on page one and two of this FY 2016-2017 Action Plan.

During FY 2016-2017, the following public service programs will be undertaken:

Youth Services

Court Appointed Special Advocates of San Bernardino County (C.A.S.A): This program provides recruitment, screening, training and supervision of community volunteers to mentor at risk youth.

Five-Year Objective:	10 people (Youth)
FY 2016-2017 Objective:	10 people
D 604	Low and Moderate-Income Limited Clientele
Benefit:	(LMC)
Geographic Distribution:	Citywide
Performance Measure	Suitable Living Environment/Accessibility and
Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$2,500 CDBG

High Desert Transitional Living Connection: This program provides backpacks and hygiene items to foster youth, at risk youth, low income and homeless individuals

Five-Year Objective:	400 people (Youth)
FY 2016-2017 Objective:	400 people
D 6°4	Low and Moderate-Income Limited Clientele
Benefit:	(LMC)
Geographic Distribution:	Citywide
Performance Measure	Suitable Living Environment/Accessibility and
Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$5,000 CDBG

After-School Programs: This program provides an after school program including recreational, education and social enrichment activities for low income youth at two school on site locations.

Five-Year Objective:	250 (Youth)
FY 2016-2017 Objective:	50 people for 6 th Street
	40 people for Brentwood
Benefit:	Low and Moderate-Income Limited Clientele
	(LMC)
Geographic Distribution:	Citywide
Performance Measure	Suitable Living Environment/Accessibility and
Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$20,000 CDBG 6 th Street
	\$20,000 CDBG Brentwood

Victorville City Library's Homework and Educational Literacy Program (HELP): This program provides tutors to assist students in kindergarten through 12th grade in comprehending and completing their academic assignments through guidance, support and resource selection.

Five-Year Objective:	30 people (youth)
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FY 2016-2017 Objective:	30 people
Benefit:	Low and Moderate-Income Limited Clientele
	(LMC)
Geographic Distribution:	Citywide
Performance Measure	Suitable Living Environment/Accessibility and
Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$12,500 CDBG

SPECIAL NEEDS

Moses House Ministries and Rose of Sharon Pregnancy Resource Center - Case Management and Referral Services: This program provides case management and mentoring services for pregnant teens and single mothers.

Five-Year Objective:	2,000 people with special needs
FY 2016-2017 Objective:	500 people
Benefit:	Low and Moderate-Income Limited Clientele (LMC)
Geographic Distribution:	Citywide
Performance Measure	Suitable Living Environment/Accessibility and
Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$12,500 CDBG

Sexual Assault Services - Sexual Assault Counseling Program: This program provides crisis counseling for victims of sexual assault.

Five-Year Objective:	2,000 people with special needs
FY 2016-2017 Objective:	400 people
Benefit:	Low and Moderate-Income Limited Clientele (LMC)
Geographic Distribution:	Citywide
Performance Measure	Suitable Living Environment/Accessibility and
Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$10,000 CDBG

GENERAL PUBLIC SERVICES

Legal Aid Society - Legal Services: This program provides civil legal services for low-income individuals.

Five-Year Objective:	500 people (100 annually)	
FY 2016-2017 Objective:	2016-2017 Objective: 80 people	
Benefit:	Low and Moderate-Income Limited Clientele	
	(LMC)	
Geographic Distribution:	Citywide	
Performance Measure	Suitable Living Environment/Accessibility and	

Objective/Outcome:	Availability (SL-1)
FY 2016-2017 Allocation:	\$10,000 CDBG

City of Victorville - Graffiti Abatement: This program is implemented by the Public Works Department to provide graffiti abatement services in target areas.

Five-Year Objective:	500 people (100 annually)	
FY 2016-2017 Objective:	28,898 people	
Benefit:	Low and Moderate-Income Area (LMA)	
Geographic Distribution:	Ohic Distribution: CDBG Target areas (all low mod census tracts and	
	block groups)	
Performance Measure	Suitable Living Environment/Sustainability (SL-3)	
Objective/Outcome:		
FY 2016-2017 Allocation:	\$4,701 CDBG	

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 5 Action Plan Antipoverty Strategy response:

During FY 2016-2017, the City will continue to implement its strategy to help impoverished families achieve economic independence and self-sufficiency. The City's anti-poverty strategy utilizes existing County job training and social service programs to increase employment marketability, household income, and housing options. In addition, the City will allocate \$174,701 to a variety of public service agencies that offer supportive services in the fight against poverty and other special needs. Specifically, some of these organizations provide direct assistance in the form of food and housing, others provide indirect assistance such as case management and referral services to other service programs. The City will coordinate with and refer people to programs offered by the County of San Bernardino.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

- 1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.
- 2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 5 Action Plan Specific Objectives response:

- 1. The "non-homeless special needs" category is assigned a High Priority need level in the City's 2012-2017 Consolidated Plan. This category includes persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addictions, and victims of domestic violence. For FY 2016-2017, the City expects to fund the following programs to address these needs:
 - Sexual Assault Services
 - Victor Valley Domestic Violence A Better Way
 - Senior Home Repair Program
- 2. Additional federal, State, local public- and private-sector resources that are likely to be available for addressing identified non-homeless special needs are described in the Public Services section of the Community Development portion of this document.

Housing Opportunities for People with AIDS

- 1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.
- 2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
- 3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
- 4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
- 5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
- 6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.

- 7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
- 8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
- 9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 5 Action Plan HOPWA response:

Not applicable; the City of Victorville does not receive or administer HOPWA funds.

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Program Year 5 Specific HOPWA Objectives response:

Not applicable; the City of Victorville does not receive or administer HOPWA funds.

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

Fostering and Maintaining Affordable Housing

The City has placed high priority on preserving the existing affordable housing stock through rehabilitation. For FY 2016-2017, \$229,472 in HOME funds will be used for the Senior Home Repair Program to assist very low and low income seniors and disabled homeowners to correct code violations and unsafe conditions.

In addition, the Economic Development Department will launch on July 1, 2016 two new rehabilitation programs to assist low and moderate income households correct code violations and beautify their yards. The Code Corrections Program will be made available to homeowners as well as renters. The assistance through these programs will be in the form of a deferred loan.

Worst Case Needs

The City has identified senior, disabled and handicapped homeowners as those most in need of home repairs (i.e. worse case needs), and those least able to qualify for private

financing to take care of their property repairs. Due to limited funding compared to the extent of needs, the City's Senior Home Repair Program has incurred a waiting list since its inception in 1997. Delayed maintenance, unfortunately, results in higher rehabilitation costs and further reduces the number of households that can be assisted. In response, the Senior Home Repair program continues to receive an annual allocation of at least \$200,000.

The City also offers an Owner Occupied Rehabilitation Program. The purpose of the Owner Occupied Rehabilitation (OOR) Program is to provide assistance to homeowners of single-family homes to satisfy their basic housing needs; for the preservation of decent, safe, and sanitary housing; to correct hazardous structural conditions; to make improvements considered necessary to eliminate blight or to improve handicapped access; and, to correct building and health code violations. The assistance is provided in the form of a deferred loan.

The Owner Occupied Rehabilitation (OOR) Program provides loans at two (2%) percent interest up to \$50,000.00 to homeowners residing in the city limits. Deferred loans will become due and payable to the City of Victorville Economic Development Department when the home is sold, refinanced, transferred, or at the end of thirty years, whichever comes first.

The OOR is funded with HOME and CalHome Funds.

Obstacles to Fair Housing

The City of Victorville will contract with the Inland Fair Housing and Mediation Board for the provision of fair housing and landlord/tenant mediation services in FY 2016-2017. Inland Fair Housing will affirmatively further fair housing through public education workshops, counseling, conciliation, landlord/tenant mediation (including mobile parks), and other outreach services.

The City of Victorville's Analysis of Impediments (AI) was completed in 2012 and identified needs in the following areas:

- Transitional housing for the homeless and victims of domestic violence;
- Independent living for people with disabilities and seniors that is accessible and affordable;
- Fair Housing outreach to further educate on property management and renters rights.

In November 2012, the City of Victorville updated its AI in accordance with HUD regulations with the intent to ensure compliance with Consolidated Plan certification requirements to affirmatively further fair housing.

As a result of the update, three new impediments were identified. A summary of all impediments identified in the update are as follows:

- Lack of affordable large family rental units;
- Limited supply of housing available to persons with disabilities;
- Discrimination due to national origin, race, familial status and disability;
- Deterioration of existing housing supply.

The AI identified the strategy to address these impediments as follows:

- The City will provide fair housing outreach, landlord/tenant rights outreach, mediation and education services that will include, but not limited to at least two of the following components: press releases, public service announcements, cable TV, radio and newspaper outreach, updates in newspapers and/or events relating to the annual fair housing celebration.
- This outreach and education will be targeted to the populations outlines in the AI, likely to experience discrimination, or to be under represented, housing providers, elected and appointed officials of each jurisdiction and the general public.
- The City will work with developers to identify and pursue all available funding to develop affordable housing, to include large family rentals, units for seniors and the disabled. Recently, the City assisted with a complex that provided units for larger households.
- The City continues to improve the housing stock through its housing rehabilitation programs, such as the Senior Home Repair Program, Owner Occupied Rehabilitation Program and Acquisition, Rehabilitation and Resale Program.

Leveraging Funds

All CDBG-funded projects proposed for FY 2016-2017 will include leveraging of other resources, such as grants from Federal, State, and local governments, private foundations, capital development funds, general funds, private donations of funds or services, and other various funding sources.

Currently the City of Victorville's down payment assistance program is funded with CalHome funds. The City was awarded \$1,000,000 in CalHome funds in 2012.

Substantial Amendments

As stated in the City's Citizen Participation Plan, the City of Victorville shall consider a substantial amendment or change to have occurred under the following circumstances:

- A significant shift is proposed in allocation priorities, or a substantial change in the method of distributing funds;
- An activity not included in the Action Plan is proposed for funding;
- To use funds, including program income, not previously described in the Action Plan;
- An activity included in the Action Plan is proposed for elimination or cessation;
- The amount allocated to any activity is proposed to be increased or decreased from the amount described in the Action Plan by more than 25%; or
- Change in the location of the activity, target area, beneficiaries, eligibility criteria or general scope from that described in the Action Plan.

No activities met the criteria for substantial amendment.

HOME Program Specific Requirements

In July 2007, the Town of Apple Valley and the City of Victorville executed a HOME Consortium Agreement, formalizing the HOME Program Consortium into one geographically contiguous unit. The Consortium agreement automatically renews unless the Consortium choose not to renew the agreement. The HOME Consortium expects to receive \$535,507 for FY 2016-2017. Of the total, the Consortium intends to allocate at least 15 percent or \$80,326 for Community Development Housing Organization (CHDO) activities; 10 percent or \$53,551 for program administration; and 75 percent or \$401,630 for housing program activities. Specifically Victorville will receive \$310,326, which will be allocated as follows:

•	HOME Administration	\$16,333
•	Senior Home Repair Program	\$244,994
•	CHDO	\$48,999

In June 2015, National Community Renaissance (National Core) was approved as a Community Housing Development Organization (CHDO) with the Apple Valley Victorville Consortium. They proposed project is for the rehabilitation of the roofs at Northgate Village Apartments, which is located in the City's CDBG target area. The complex consists of 18 buildings and a total of 140 units. The Consortium has pledged \$800,000 to the project. The funds are an accumulation of several years of CHDO and reallocated funds.

In November 2015, National Core conducted a bid walk for the project. Two contractors submitted bids, with the lowest bid at \$1,040,000. A construction contract has not been executed due to National Core securing financing for the balance of the contract and contingency.

Match Requirement: The HOME Program requires a 25-percent match based on fund expenditure. The HOME statute provides a reduction of the matching contribution requirement under three conditions: 1) Fiscal distress; 2) Severe fiscal distress; and 3) Presidentially declared major disasters covered under the Stafford Act. The Consortium has been identified by HUD as a fiscally distressed jurisdiction and has been granted a 100-percent match reduction for FY 2016-2017. Nevertheless, Consortium staff will track HOME eligible activities for future match.

HOME Tenant-Based Rental Assistance: The Consortium does not intend to fund any tenant-based rental assistance for FY 2016-2017. Should a need for this type of activity arise in the future, guidelines for tenant-based rental assistance will be developed pursuant to HOME regulations.

Equal Opportunity and Fair Housing: The Consortium will conform with the requirements of Title VI of the Civil Rights Act of 1962 as amended, 42 USC 2000d, The Fair Housing Act 42 USC 3601-3620, with Executive Order 11063 as amended by Executive Order 12259, and adhere to the prohibitions against discrimination on the basis of age under the Age Discrimination Act of 1975 as amended 42 USC 6101; and on the basis of handicapped status, as stipulated under 42 12131; 47 USC 155, 201, 218, and 225, respectively.

The Consortium will also comply with Executive Order 11246, Section 504 of the Rehabilitation Act of 1973 and the requirements of Section 3 of the Housing and Urban Development Act of 1968, as set forth in 12 USC 1701u. The Consortium prohibits discrimination against individuals as protected by the preceding in its HOME assisted projects and programs. The Consortium will conform to the requirements of Executive Orders 11625, 12432, and 12138, to achieve equal opportunity contracting objectives by encouraging the use of women and/or minority owned or controlled enterprises in HOME assisted projects and programs.